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UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

In Re: Pork Antitrust Litigation

Case No. 0:18-cv-01776-JRT-JFD

This Document Relates To:

All Consumer Indirect Purchaser  
Plaintiffs Actions

**JOINT MOTION REGARDING CONTINUED SEALING**

Documents have been filed under temporary seal in connection with the following motion:

<i>Defendants' Motion to Exclude the Testimony of Dr. Hal Singer</i>	<i>Doc No. 1466</i>
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Pursuant to LR 5.6, the parties submit this Joint Motion Regarding Continued Sealing.

DKT. NO.	DKT. NO. OF REDACTED VERSION (IF FILED)	DESCRIPTION OF DOCUMENT	PRECISELY IDENTIFY: a) The information that the parties agree should remain sealed; b) The information the parties agree should be unsealed; and c) The information about which the parties disagree.	NONPARTY THAT DESIGNATED DOC. CONFIDENTIAL (IF ANY)	REASON WHY DOCUMENT SHOULD REMAIN SEALED OR BE UNSEALED
1470	N/A	Memorandum of Law in Support of Defendants' Joint Motion to Exclude the Expert Report and Testimony of Dr. Hal Singer	<p>The Parties agree to unseal certain portions of this brief, which is reflected in the filed attachment.</p> <p>The parties disagree as to the scope of redactions, and the attachment are those redactions that Defendants propose. Plaintiffs propose fewer redactions, which they file under separate cover.</p>		<p><u>Plaintiffs:</u> Except for confidential Third-Party data and documents, Plaintiffs propose unsealing the entire document because this case is of public significance, the proposed absent class members have due process interests in the evidence of defendants' wrongdoing, and the information is not a trade secret and does not appear to be commercially sensitive now in 2023.</p> <p><u>Defendants:</u> Redactions cover confidential business information and methods of parties and third parties. Those redactions are limited to (1) discussion of confidential data produced by the parties and third parties; and (2) quotes or descriptions of confidential documents.</p>
1474	N/A	Index to Exhibits Filed Under Seal	The parties agree that this document can be unsealed.		

1474-1	N/A	Exhibit A to the Declaration of Craig Coleman in Support of Defendants' Memorandum of Law in Support of Defendants' Joint Motion to Exclude the Expert Report and Testimony of Dr. Hal Singer ("Coleman Singer Decl.")	The parties disagree as to whether this document should remain sealed. Defendants contend that the entire document should remain sealed. Plaintiffs contend that the document should be unsealed except for documents and data provided by third parties.		<p><u>Plaintiffs:</u> Except for confidential Third-Party data and documents, Plaintiffs oppose sealing as this case is of public significance, the proposed absent class members have due process interests in the evidence of defendants' wrongdoing, and the document is not a trade secret and does not appear to be commercially sensitive now in 2023.</p> <p><u>Defendants:</u> The Declaration contains a significant volume of citations to and discussion of documents and testimony that contains confidential business information and methods of parties and third parties, including sales data for both. Given the voluminous citations and extensive discussion, redactions are impractical. References to the Declaration contained in the parties' briefing is generally higher level and not redacted.</p>
1474-2	N/A	Exhibit B to the Coleman Singer Decl.	The parties agree that this document can be unsealed.		
1474-3	N/A	Exhibit D to the Coleman Singer Decl.	The parties agree that this document can be unsealed.		

1474-4	N/A	Exhibit E to the Coleman Singer Decl.	<p>Plaintiffs' position is that this document should be unsealed.</p> <p>Defendants' position is that this document should remain sealed.</p>		<p><u>Plaintiffs</u>: Plaintiffs oppose sealing as this case is of public significance, the proposed absent class members have due process interests in the evidence of defendants' wrongdoing, and the document is not a trade secret and does not appear to be commercially sensitive now in 2023.</p> <p><u>Defendants</u>: Contains information regarding confidential business methods and analysis.</p>
1474-5	N/A	Exhibit G to the Coleman Singer Decl.	The parties agree that this document can be unsealed.		
1474-6	N/A	Exhibit H to the Coleman Singer Decl.	The parties agree that this document can be unsealed.		
1474-7	N/A	Exhibit I to the Coleman Singer Decl.	<p>Plaintiffs' position is that this document should be unsealed.</p> <p>Defendants' position is that this document should remain sealed.</p>		<p><u>Plaintiffs</u>: Plaintiffs oppose sealing as this case is of public significance, the proposed absent class members have due process interests in the evidence of defendants' wrongdoing, and the document is not a trade secret and does not appear to be commercially sensitive now in 2023.</p> <p><u>Defendants</u>: Contains information regarding confidential business methods and analysis.</p>
1474-8	N/A	Exhibit J to the Coleman Singer Decl.	The parties agree that this document can be unsealed.		

1474-9	N/A	Exhibit K to the Coleman Singer Decl.	The parties agree that this document can be unsealed.		
1474-10	N/A	Exhibit L to the Coleman Singer Decl.	The parties agree that this document can be unsealed.		
1474-11	N/A	Exhibit M to the Coleman Singer Decl.	The parties agree that this document can be unsealed.		
1474-12	N/A	Exhibit N to the Coleman Singer Decl.	The parties agree that this document can be unsealed.		
1474-13	N/A	Exhibit O to the Coleman Singer Decl.	The parties agree that this document can be unsealed.		
1474-14	N/A	Exhibit P to the Coleman Singer Decl.	The parties agree that this document can be unsealed.		
1474-15	N/A	Exhibit Q to the Coleman Singer Decl.	The parties agree that this document can be unsealed.		

1625	N/A	Consumer Indirect Purchaser Plaintiffs' Opposition to Defendants' Joint Motion to Exclude the Expert Report and Testimony of Dr. Hal Singer	<p>The Parties agree to unseal certain portions of this brief, which is reflected in the filed attachment.</p> <p>The parties disagree as to the scope of redactions, and the attachment are those redactions that Defendants propose. Plaintiffs propose fewer redactions, which they file under separate cover.</p>	<p><u>Plaintiffs</u>: Except for confidential Third-Party data and documents, Plaintiffs propose unsealing the entire document because this case is of public significance, the proposed absent class members have due process interests in the evidence of defendants' wrongdoing, and the information is not a trade secret and does not appear to be commercially sensitive now in 2023.</p> <p><u>Defendants</u>: Redactions cover confidential business information and methods of parties and third parties. Those redactions are limited to (1) discussion of confidential data produced by the parties and third parties; and (2) quotes or descriptions of confidential documents.</p>
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1730	N/A	Reply Memorandum in Support of Defendants' Joint Motion to Exclude the Expert Report and Testimony of Dr. Hal J. Singer	<p>The Parties agree to unseal certain portions of this brief, which is reflected in the filed attachment.</p> <p>The parties disagree as to the scope of redactions, and the attachment are those redactions that Defendants propose. Plaintiffs propose that the entirety of the document be unsealed, which they file under separate cover.</p>	<p><u>Plaintiffs</u>: Except for confidential Third-Party data and documents, Plaintiffs propose unsealing the entire document because this case is of public significance, the proposed absent class members have due process interests in the evidence of defendants' wrongdoing, and the information is not a trade secret and does not appear to be commercially sensitive now in 2023.</p> <p><u>Defendants</u>: Redactions cover confidential business information and methods of parties and third parties. Those redactions are limited to (1) discussion of confidential data produced by the parties and third parties; and (2) quotes or descriptions of confidential documents.</p>
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Dated: February 10, 2023

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